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18 **UNITED STATES DISTRICT COURT**
19 **EASTERN DISTRICT OF CALIFORNIA**

20 LARRY BIEGLER an individual;
21 ALYSIA BIEGLER, an individual;

22 *Plaintiffs,*

23 vs.

24 NATIONAL GENERAL
25 INSURANCE COMPANY; and
26 DOES 1 through 20, inclusive

27 *Defendants.*
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CASE NO.: 2:22-CV-00560-MCE-DMC

**STIPULATION AND ORDER TO
CONTINUE CASE DEADLINES**

1 Plaintiffs Larry Biegler and Alysia Biegler and defendants National
2 General Insurance Company and Integon General Insurance Company, by and
3 through their respective counsel of record, stipulate and agree as follows and
4 respectfully request entry of an order giving effect to their stipulation:

5 WHEREAS, the parties stipulated to a schedule on September 14, 2022
6 Joint Rule 26(f) Report (*see* ECF Dkt. No. 21);

7 WHEREAS, the parties have continued to engage in discovery during this
8 period, including scheduling and taking depositions of multiple witnesses;

9 WHEREAS, the parties recently engaged in mediation as a means of
10 resolving their dispute which was unsuccessful;

11 WHEREAS, a continuance of certain pre-trial deadlines are necessary to
12 provide the parties with adequate time to prepare for trial;

13 WHEREAS, despite the parties being diligently engaged in discovery, the
14 parties have still had to reschedule numerous depositions noticed based on party
15 availability, whereabouts, location of the witness, and/or schedule of the witness;
16 the deposition of Michael Myers was scheduled for June 27, 2023 but recently
17 has been cancelled by Mr. Myers due to a scheduling conflict.

18 WHEREAS, there is good cause for a brief continuance, and no party will
19 be prejudiced by this first request for a continuance;

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WHEREAS, the parties agree that the interests of judicial economy, efficiency and convenience of the Court and the parties would be furthered by continuing the dates in the in the case management schedule filed on September 14, 2022 (ECF Dkt. No. 21) by approximately 60 days, as follows:

	Original Deadline	Proposed Deadline (Adding 60 Days)
Designation of Expert Witnesses	July 3, 2023	August 18, 2023
Designation of Rebuttal Experts	July 17, 2023	September 1, 2023
Expert Discovery Cut off	August 3, 2023	October 31, 2023
Defendants' Motion For Summary Judgment and Plaintiffs' Cross Motion for Summary Judgment Hearing Date	July 27, 2023	August 10, 2023
Discovery & Motion Hearing Cut-off	October 2, 2023	October 2, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions	30 Days After Ruling on Dispositive Motions

1 WHEREAS, the parties agree that all other case deadlines, including trial
2 and motion deadlines, and dates imposed by order, local rules, or otherwise, shall
3 be reset in accordance with the 60 day continuance requested;

4 NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

5 The deadlines in this matter, set forth in parties' order and all other case
6 deadlines be continued by approximately 60 days as set forth in part in the table
7 above, or as soon thereafter as the Court's calendar allows. Alternatively, the
8 parties respectfully request that the Court set a further case management
9 conference at which new dates may be selected.


10 The parties respectfully request the Court to adopt the foregoing stipulation as
11 the order of the Court.

12 **IT IS SO STIPULATED.**

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14 Respectfully submitted,

15 Dated: June 21, 2023

16 RICHARDS WILLIS, PC

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18 By 
19 _____
20 EVAN WILLIS
21 Attorneys for Plaintiffs
22 LARRY BIEGLER and ALYSIA
23 BIEGLER
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1 Dated: June 21, 2023

RESNICK & LOUIS P.C.

2
3 By 
4 ROBERT B. PONZIANO

5 Attorney for Defendant
6 NATIONAL GENERAL INSURANCE
7 and INTEGON GENERAL
8 INSURANCE
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ORDER

Pursuant to the above stipulation, the Court hereby continues the deadlines set forth the parties Joint Rule 26(f) Report and all other case deadlines by 60 days, in part, as follows:

	Original Deadline	Proposed Deadline (Adding 60 Days)
Designation of Expert Witnesses	July 3, 2023	August 18, 2023
Designation of Rebuttal Experts	July 17, 2023	September 1, 2023
Expert Discovery Cut off	August 3, 2023	October 31, 2023
Defendants' Motion For Summary Judgment and Plaintiffs' Cross Motion for Summary Judgment Hearing Date	July 27, 2023	August 10, 2023

Discovery & Motion Hearing Cut-off	October 2, 2023	October 2, 2023
Joint Notice of Trial Readiness	30 Days After Ruling on Dispositive Motions	30 Days After Ruling on Dispositive Motions

IT IS SO ORDERED.

Dated: June 22, 2023



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE